

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>  <hr/> <b>THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBITS ATTACHED HERETO</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**JOINT MOTION TO DISMISS WITHOUT PREJUDICE**

Plaintiffs, whose cases are listed on the attached Exhibits A – E, and Defendants, Johnson & Johnson, Ethicon, Inc. and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

**EXHIBIT A**  
**(Aylstock Witkin Kreis & Overholt)**

<b>Civil Action No.</b>	<b>Case Style</b>
2:13-cv-32515	Michelle Eberhart and Gary Eberhart v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:16-cv-07719	Sandra Crowson v. Ethicon, Inc.; Johnson & Johnson

**EXHIBIT B**  
**(Chaffin Luhana)**

<b>Civil Action No.</b>	<b>Case Style</b>
2:13-cv-15145	Cynthia Korsgaard and Steven J. Korsgaard v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-09258	Brigid K. Miklovic and Thomas Miklovic v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:13-cv-06565	Deborah G. Salem v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson
2:12-cv-06590	Lisa Lehrman-Bon and Roger Lehrman-Bon v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson

**EXHIBIT C**  
**(The Law Offices of Ben C. Martin)**

<b>Civil Action No.</b>	<b>Case Style</b>
2:15-cv-13560	Stephanie H. Smith and Benjamin T. Smith v. Ethicon, Inc.; Johnson & Johnson

**EXHIBIT D**  
**(The Whitehead Law Firm)**

<b>Civil Action No.</b>	<b>Case Style</b>
2:14-cv-28102	Norma L. McConnell v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-12328	Tannia Fournet and Mike Fournet v. Ethicon, Inc.; Johnson & Johnson

**EXHIBIT E**  
**(Tom Rhodes Law Firm)**

<b>Civil Action No.</b>	<b>Case Style</b>
2:13-cv-20441	Nicholle Winters and Johnny Winters v. Ethicon, Inc.; Ethicon, LLC; Johnson & Johnson